

REMARKS

The Office Action dated May 29, 2007 has been received and carefully considered. In this response, claims 1-4, 7-14, 20, and 24-27 have been amended. No new matter has been added. Entry of these amendments is respectfully requested. Reconsideration of the outstanding rejections in the present application is also respectfully requested based on the following remarks.

I. THE ANTICIPATION REJECTION OF CLAIMS 1-25 AND 27

On page 3 of the Office Action, claims 1-25 and 27 were rejected under 35 U.S.C. § 102(b) as being anticipated by Bushey (U.S. Patent No. 6,389,400). This rejection is hereby respectfully traversed.

Bushey does not disclose each and every element as previously or presently claimed. For example, regarding claims 1 and 24-27, as originally presented, Bushey fails to teach or suggest pre-forming a call routing strategy or a list of offers in anticipation of customer calls. Instead, Bushey only discloses call routing decisioning after receiving a customer call. *See e.g.*, Bushey at Figures 1 and 2, col. 8, lines 16-30 and lines 35-47. Regarding claims 8, 12 and 20, as original presented, Bushey never mentions the use of “*a probability derived from the customer specific information*” in its call routing decisioning process.

Since Bushey does not anticipate any of the independent claims as originally presented, Bushey cannot anticipate any of the dependent claims, either.

Notwithstanding the above-described deficiencies of Bushey, Applicant has voluntarily amended independent claims 1, 8, 12, 20, and 24-27. As currently amended, these claims now recite, among other things, further details of generating routing control signals in a virtual call

center integrating telephony with computers as disclosed and claimed in the parent applications 10/286,767 (now U.S. Patent No. 6,714,642) and 09/349,960 (now U.S. Patent No. 6,553,113). See e.g., claims 1, 8 and 15 of U.S. Patent No. 6,714,642. For example, claim 1 recites:

*“... receiving information of a call at the central server system;
generating a first routing control signal to route the call to an interactive voice response unit shared by a plurality of call sites, wherein the interactive voice response unit is external to an exchange carrier providing the call;
receiving input from a caller at the interactive voice response unit, the input at least identifying the caller as the customer for whom the call routing strategy has been pre-formed; and
generating a second routing control signal for routing the call to one of said plurality of call sites based at least in part on the pre-formed call routing strategy associated with that customer.”*

Claims 8, 12, 20, and 24-27 recite same or similar features.

Since Bushey does not teach or suggest these features, and also because of the above-described deficiencies which persist, claims 1, 8, 12, 20, and 24-27 are allowable over Bushey. For at least the same reasons, claims 2-7, 9-11, 13-19, and 21-23, which depend from claims 1, 8, 12, and 20 respectively, should also be allowable over Bushey.

In view of the foregoing, it is respectfully requested that the aforementioned anticipation rejection of claims 1-25 and 27 be withdrawn.

II. THE OBVIOUSNESS REJECTION OF CLAIM 26

On page 11 of the Office Action, claim 26 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bushey in view of Nabe (U.S. Pub. No. 20020194117). This ground of rejection has become moot in view of the deficiencies of the primary reference Bushey as well as the current amendment to claim 26.

In view of the foregoing, it is respectfully requested that the aforementioned obviousness rejection of claim 26 be withdrawn.

III. CONCLUSION

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

Please charge any shortage in fees due in connection with the filing of this paper to Deposit Account No. 07-1700, and please credit any excess fees to the same deposit account.

Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,
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